

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP., Plaintiff, v. MICROSOFT CORPORATION, Defendant.	Case No. 7:24-cv-00338 JURY TRIAL DEMANDED
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**JOINT NOTICE OF DISMISSAL WITHOUT PREJUDICE OF VIRTAMOVE, CORP.’S
CLAIMS OF PRE-SUIT INDIRECT INFRINGEMENT**

Plaintiff VirtaMove Corp. (“VirtaMove”) and Defendant Microsoft Corp. (“Microsoft”) jointly provide notice to the Court of the following:

On December 20, 2024, VirtaMove filed its Complaint alleging Microsoft’s infringement of U.S. Patent Nos. 7,519,814 and 7,784,058 (the “Asserted Patents”). VirtaMove’s Complaint included allegations of pre-suit indirect infringement against Microsoft.

Pursuant to Section VII of this Court’s January 23, 2024 Standing Order Governing Proceedings (OGP) 4.4—Patent Cases, the parties have met and conferred, and have agreed VirtaMove dismisses without prejudice its claims of pre-suit indirect infringement of the Asserted Patents against Microsoft. VirtaMove has leave to re-plead those allegations of pre-suit indirect infringement within three months after fact discovery opens. The parties agree that the parties are permitted to conduct fact discovery on pre-suit indirect infringement during those three months.

Dated: March 13, 2025

Respectfully submitted,

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**ATTORNEY FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing via electronic mail to all counsel of record. Any other counsel of record will be served by first class U.S. mail.

/s/ John M. Guaragna
John M. Guaragna